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June 28, 2013

VIA HAND DELIVERY

Honorable Thomas P. Griesa Daniel Patrick Moynihan United States Courthouse 500 Pearl St., Room 1630 New York, NY 10007-1312

USDC SDNY	
DOCUMENT	ALLY FILED
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DATE FILED:	07/93/15

Re: NML Capital, Ltd. v. the Republic of Argentina, No. 03 Civ. 8845 (TPG) et al.

Dear Judge Griesa:

We are counsel to NML Capital, Ltd. ("NML"), and write to provide the Court with courtesy copies of NML's motion to compel, which was first raised with the Court in my letter of February 27, 2013 and which was filed on June 27, 2013, and to respectfully request that the Court endorse the briefing schedule that the parties have negotiated.

In my February 27, 2013 letter, we brought to the Court's attention a discovery dispute with defendant the Republic of Argentina (the "Republic") relating to discovery requests NML served on the Republic on August 14, 2012 (the "Discovery Requests"). In response to my letter, the Court scheduled a conference for 3:00 p.m. on August 5, 2013 to address open discovery disputes in NML's actions, in *Aurelius Capital Partners, LP et al. v. the Republic of Argentina*, No. 07 Civ. 2715 (TPG) et al., and *Scheck v. the Republic of Argentina*, No. 10 Civ. 5167 (TPG).

In advance of the August 5 discovery conference, NML and the Republic have agreed to a briefing schedule relating to NML's Discovery Requests, pursuant to which NML's motion to compel was to be filed on June 27, 2013; the Republic's opposition papers are to be filed on or before July 17, 2013, and NML's reply papers are to be filed on or before July 24, 2013. We respectfully request that the Court endorse the parties' proposed briefing schedule.

In accordance with the parties' agreement, NML filed its motion to compel on June 27, 2013. Enclosed are courtesy copies of the Notice Of Motion To Compel Compliance With Plaintiff's Discovery Requests Directed To The Republic Of Argentina, the supporting Declaration of Eric



Honorable Thomas P. Griesa June 28, 2013 Page 2

C. Kirsch, and the Memorandum Of Law In Support Of Plaintiff's Motion To Compel Compliance With Discovery Requests Directed To Defendant The Republic Of Argentina.

Respectfully submitted,

Robert A. (chen (MB)

Robert A. Cohen

Enclosures

cc: Carmine D. Boccuzzi, Jr., Esq.

Thomas Pariesa